

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MOUNTECH IP LLC,

Plaintiff,

v.

BLACKBERRY CORPORATION,

Defendant.

Civil Action No.: 1:20-cv-00865-MN

TRIAL BY JURY DEMANDED

AFFIDAVIT IN SUPPORT OF REQUEST FOR CLERK’S ENTRY OF DEFAULT

I, Jimmy Chong (“Affiant”) being first duly sworn and deposed, does hereby state, under penalty of perjury, the following true and accurate facts to the best of information and belief:

1. I have personal knowledge of the matter asserted herein.
2. I am a partner with the Chong Law Firm, counsel for Plaintiff, Mountech IP LLC (“Plaintiff”) in this action.
3. Plaintiff filed its Complaint herein against the Defendant, Blackberry Corporation, (“Defendant”), on June 28, 2020 (*see* D.E. 1). A copy of the Complaint is attached hereto as Exhibit A.
4. On June 30, 2020, Plaintiff caused the Summons and Complaint, along with filed Exhibits, to be served upon Defendant by and through its statutorily required Registered Agent, Corporation Trust Company (*see* D.E. 6). A copy of the executed summons is attached hereto as Exhibit B.
5. Under the Federal Rules of Civil Procedure, Defendant’s deadline to answer, move, or otherwise respond to Plaintiff’s Complaint was July 21, 2020.
6. Neither Plaintiff nor the Court have granted Defendant an extension of time to answer, move or otherwise respond to Plaintiff’s Complaint.

7. Defendant has failed to answer, move or otherwise response to Plaintiff's Complaint as required by Federal Rules of Civil Procedure 2(a)(1)(A).

8. For this reason, Plaintiff, in accordance with Rule 55(a) of the Federal Rules of Civil Procedures, respectfully requests that the Clerk enter an Order of Default, in the form attached hereto, against the Defendant, Blackberry Corporation.

I declare, under penalty of perjury under the laws of the United States of America and the State of Delaware, that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: August 13, 2020

Respectfully submitted,

/s/Jimmy Chong

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